

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

EDWARD HOTEL MICHIGAN, LLC d/b/a
EDWARD HOTEL & CONVENTION CENTER d/b/a
EDWARD HOTEL, EDWARD HOTEL DETROIT, LLC,
EDWARD HOTEL MANAGEMENT, LLC, EDWARD HOTEL
HOLDINGS, INC.

and

Case No. 07-CA-240810

LOCAL 324, INTERNATIONAL UNION OF OPERATING
ENGINEERS (IUOE), AFL-CIO

_____/

Odey K. Meroueh (P76460)
Zachary A. Hallman (P78327)
MEROUEH & HALLMAN LLP
Attorney for Respondent
14339 Ford Road, 2nd Floor
Dearborn, Michigan 48126
313.582.7469
okm@mhatlaw.com
zhallman@mhatlaw.com

_____/

RESPONDENT'S RESPONSE TO GENERAL COUNSEL'S
MOTION TO SHOW CAUSE

NOW COMES Respondents, through their attorneys, MEROUEH & HALLMAN, LLP, and in support of their collective response to General Counsel's Motion to Show Cause, state as follows:

1. After closing last December, Respondent party suffered a number of incidents leading to the delay of discovering information relevant to this instant matter.

2. Such information included, but is not limited to, multiple flooding incidents affecting the physical filing system that the respondents kept of their employees.
3. The computer files kept by Respondents were also difficult for Respondents to gain access to, as such were in many cases password protected with passwords only to known to former employees.
4. Despite the difficulties involved, Respondents spent the time and expended what was necessary in making a good faith effort to make Petitioner's whole.
5. Respondents were putting all of their resources and effort into the resolution of this matter, in particular while such talks were being facilitated by agents of the local board office.

WHEREFORE, Respondents therefore request that while negotiations remain open and the matter remain on the eve of settlement, that all pending motions and dates in this matter before the National Labor Relations Board be adjourned and/or stayed and in the alternative if this matter is moving beyond negotiation stages, additional time to file a response to the allegations formed in this instant matter.

MEROUEH & HALLMAN, LLP
Attorneys for Plaintiffs

By: /s/ Zachary A. Hallman
Zachary A. Hallman, P78327
14339 Ford Rd., 2nd Flr.
Dearborn, MI 48126
313.582.7469

Dated: September 11, 2019

